



## Department of Energy

Ohio Field Office  
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(513) 648-3155



**3881**

SEP 25 2001

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5<sup>th</sup> Street  
Dayton, Ohio 45402-2911

DOE-0909-01

Dear Mr. Schneider:

**RESPONSE TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY'S CONDITIONAL  
APPROVAL OF WETLAND PERMITTING CROSSWALK FOR THE WASTE STORAGE AREA  
EXTRACTION SYSTEM AND SOUTH FIELD EXTRACTION SYSTEM SUPPLEMENTAL WELL  
PROJECT**

Reference: Letter, T. Schneider to J. Reising, "Conditional Approval Wetland Cross-Walk  
for Extraction Systems," dated August 27, 2001

The Department of Energy (DOE) has evaluated the conditional approval received from the Ohio Environmental Protection Agency (OEPA) on the subject permitting crosswalk. The DOE requests clarification with regards to the stabilization and revegetation effort that is the condition of the OEPA's approval. The DOE's position is that the stabilization/vegetation of the ditches in question is limited to the stabilization of disturbed soils with the native grass seed mixture approved by the OEPA and being used on other projects such as the OSDF and Borrow Area.

Your conditional approval letter referred to the stabilization/revegetation of the Pilot Plant Drainage Ditch undertaken by Operable Unit 4 (OU4). As you know, the OU4 effort was a considerable revegetation effort involving the planting of a significant number of nursery grown wetland vegetation (e.g., herbaceous plugs) within the Pilot Plant Drainage Ditch stream bed. The DOE does not believe that this project specific decision establishes a precedent for committing to this type of revegetation effort in all instances. The DOE believes it is not appropriate to commit resources to this type of revegetation effort in uncertified areas. The storm sewer outfall ditch (the primary subject of the wetland permitting crosswalk) is not certified and may undergo excavation during certification activities. As you know, the DOE has plans to mitigate losses to wetlands impacted on the Fernald Environmental Management Project (FEMP) through implementation of the Natural Resource Restoration Plan. The DOE believes the responsibility for isolated drainage ditch impacts due to remediation projects be limited to restoring the approximate original condition of the drainage channel and stabilizing disturbed areas using native

SEP 25 2001

3881

Mr. Tom Schneider

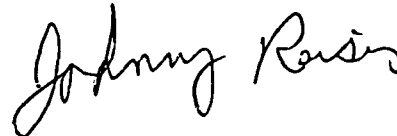
-2-

DOE-0909-01

grasses as specified in other projects throughout the FEMP. Therefore, absent further correspondence from your office concerning this matter, the DOE will restore and stabilize the area in question in accordance with the existing project specifications.

If you have any questions regarding this matter, please contact Robert Janke at (513) 648-3124.

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:R.J. Janke

cc:

R. Greenberg, EM-31/CLOV  
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R. Vandegrift, ODH  
F. Hodge, Tetra Tech  
D. Brettschneider, Fluor Fernald, Inc./MS52-5  
D. Carr, Fluor Fernald, Inc./MS2  
J. D. Chiou, Fluor Fernald, Inc./MS52-0  
T. Hagen, Fluor Fernald, Inc./MS65-2  
S. Hinnefeld, Fluor Fernald, Inc./MS52-2  
F. Johnston, Fluor Fernald, Inc./MS52-5  
T. Walsh, Fluor Fernald, Inc./MS46  
E. Woods, Fluor Fernald, Inc./MS65-2  
~~AR Coordinator~~, Fluor Fernald, Inc./MS78  
ECDC, Fluor Fernald, Inc./MS52-7